

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RALPH M. WATSON, an individual,

Plaintiff,

v.

NY DOE 2, an individual; NY DOE 3, an individual; NY DOE 4, an individual; ILLINOIS DOE 1, an individual; DOE COMPANY, an unknown business entity; DOE 1, an individual; and DOES 2 through 100, whose true names and capacities are unknown,

Defendants.

Case No. 1:19-cv-533

SCHEDULING STIPULATION AND ~~PROPOSED~~ ORDER

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WHEREAS, the remaining parties in this action, Plaintiff Ralph Watson and Defendants NY Doe 2 and Illinois Doe 1 (collectively, the “Parties”), are in agreement that it will not be feasible to complete discovery by the March 26, 2021 deadline set forth in the Court’s Civil Scheduling Order (Dkt. 116; the “Scheduling Order”);

WHEREAS, the Scheduling Order provides that all counsel may stipulate to extend the discovery deadline by up to 60 days;

WHEREAS, the extension of the discovery deadline necessitates corresponding extensions to other dates in the Scheduling Order;

NOW, THEREFORE, the Parties stipulate as follows:

1. The Parties shall serve affirmative expert disclosures under Rule 26(a)(2) of the Federal Rules of Civil Procedure on or before **March 26, 2021**.

2. The Parties shall serve rebuttal Rule 26(a)(2) expert disclosures on or before **April 26, 2021**.
3. All discovery shall be commenced in time to be completed by **May 25, 2021**.
4. Dispositive motions, if any, are to be completed by **June 15, 2021**.*
5. A joint pretrial order, together with any motions in limine or motions to bifurcate, shall be submitted by **July 6, 2021**. The Parties shall submit requests to charge and voir dire requests. The pretrial order shall conform to the Court's Form Joint Pretrial Order, a copy of which may be obtained from the Deputy Clerk.*
6. The Parties shall be ready for trial on **48 hours'** notice on or after **July 20, 2021**.*

* Note: In the event a dispositive motion is made, the dates for submitting the Joint Pretrial Order (together with Memoranda of Law, Requests to Charge, Proposed Voir Dire, Proposed Findings of Fact and Conclusions of Law, as appropriate) shall be changed from that shown above to three (3) weeks from the decision on the motion. The ready trial date shall be adjourned to a date four (4) weeks after the decision on the dispositive motion. The final pretrial conference, if any, will be scheduled by the Deputy Clerk.

At any time after the ready for trial date, counsel must notify the Court and their adversaries in writing of any potential scheduling conflicts, including, but not limited to, trials and vacations, that would prevent a trial at a particular time. Such notice must come before counsel are notified by the Court of an actual trial date, not after. Counsel should notify the Court and all other counsel in writing, at the earliest possible time of any particular scheduling problems involving out-of-town witnesses or other exigencies.

Dated: February 10, 2021

/s/ Michael W. Ayotte

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Counsel for Defendant Illinois Doe 1

SO ORDERED on February 10, 2021.



United States Magistrate Judge

DEBRA FREEMAN, U.S.M.J.